

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION**

CC HOLDINGS, LLC,	)	
CC BRIARCLIFF, LLC,	)	
CONTINUUM COURTYARDS, LLC, and	)	
COURTYARDS BRIARCLIFF, LLC,	)	
	)	No. 3:16-cv-00561
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
EAST LAKE ACQUISITION	)	
COMPANY IV LLC,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO EXTEND THE TIME TO  
RESPOND TO WRITTEN DISCOVERY**

Defendant East Lake Acquisition Company IV, LLC (“East Lake”) respectfully moves the Court for a brief extension of time in which to respond to Plaintiffs’ pending interrogatories, document requests and requests for admissions. As grounds for this Motion, East Lake states as follows:

1. This case is set for trial May 8, 2018. Dispositive motions are due October 10, 2017. Discovery is to be completed by July 11, 2017.
2. On February 17, 2017, Plaintiffs served their First Set of Interrogatories, Request for Production of Documents and Request for Admissions (collectively, the “Discovery Requests”) on East Lake via e-mail and mail. Among other things, the Discovery Requests seek a broad array of voluminous documents related to the due diligence and financing of the underlying multi-property transaction at issue in this case. The Responses are due March 20, 2017.

3. East Lake's lead outside counsel, Mark Willis, has worked diligently to gather the documents and information necessary to provide full and complete responses to the Discovery Requests, but will not be able to complete the process by March 20, 2017.

4. During the period in which the Discovery Requests have been pending, East Lake has been required to devote significant time, attention and resources to pending transactions and acquisitions.

5. During the period in which the Discovery Requests have been pending, Mr. Willis has been obliged to travel extensively and those travels have also made the collection and review of information more challenging.

6. East Lake wants and intends to provide full and complete responses to the Discovery Requests and wants to ensure the absolute accuracy of all information provided and to ensure that its responses are appropriately full and complete.

7. East Lake is continuing to work on responding to the Discovery Requests and believes it can provide full and complete responses in the timeframe requested herein.

8. Based on the foregoing, East Lake respectfully requests a brief twenty-one (21) day extension through and including April 10, 2017 to object and respond to the Discovery Requests.

9. Plaintiffs will not be prejudiced by this brief extension. Ample time remains for discovery and the trial date is more than a year away.

10. For all of the above reasons, good cause exists for granting the relief requested herein.

11. East Lake has attempted in good faith to secure an extension by agreement, but has been unable to do so.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed with the Court on March 17, 2017, using the Court's ECF System, which will serve notice upon the following counsel of record:

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s/ W. Travis Parham  
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